



21
(D. P. Promani)

2005 SEP 22 AM 10 14

September 19, 2005

Mr. John F. Carter
Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105

Re: Wal-Mart Application for Insurance and Industrial Bank Charter

Dear Mr. Carter:

As a long-time community banker from the upper mid-west, I am writing to express my strong opposition to the application filed by Wal-Mart to be approved as an industrial bank and/or loan company in the state of Utah. Too much concentration of power is not conducive to maintaining a free and open market system and it is my belief that Wal-Mart already has too much power.

For example, let me relate what was recently told to me by a local florist about the power of Wal-Mart. The florist said that during the most recent Valentine's Day (one of the largest sales days in the florist business) Wal-Mart was the only merchant selling a particular flower that had become very popular with consumers. Why? Because Wal-Mart had bought up every flower of that type in the entire world! No other florist could purchase them anywhere! That is, without doubt, monopolistic and a blatant abuse of power.

To think that Wal-Mart's market philosophy would be confined to flowers and not apply to financial services as well, would be unrealistic in view of their past actions. In banking, the maintenance of public trust is crucial and probably the principal reason that your agency exists. To sanction a commercial enterprise that is widely perceived to flaunt authority, bully its suppliers, and crush its employees attempts to organize, would reflect negatively on the whole industry and undermine public confidence in our system.

Finally, I am concerned about the precedent that such an approval would create. If there is no separation between commerce and banking, the door is open to all mass marketers. Those with thousands of locations would be the first in line. It sounds ridiculous, but what would be the basis for denying MacDonalds if you approve Wal-Mart? Thank you for your consideration.

Sincerely;

Philip C. Clark
Senior Vice President